

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI

EDWARD F. PLASTINO and,	)	
SECOND AMENDMENT FOUNDATION, INC.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Case No. 4:12-cv-01316-CAS
	)	
CHRIS KOSTER, in his Official Capacity as	)	
Attorney General of the State of Missouri; and	)	
TOM NEER, in his Official Capacity as	)	
Sheriff of St. Charles County, Missouri,	)	
	)	
Defendants.	)	
	)	

**Consent Motion for Additional Time to File a Responsive Pleading**

Defendant Missouri Attorney General Chris Koster hereby moves this Court for an Order extending his time to file a responsive pleading by fifteen (15) days, up to and including September 21, and states in further support as follows:

1. On or about July 23, plaintiff filed his complaint alleging that Section 571.101.2(1) RSMo violates Amendments II and XIV of the U.S. Constitution and that the statute is preempted by federal authority regarding immigration.
2. Defendant Chris Koster was served August 16.
3. Counsel for defendant requires an additional fifteen days, up to and including September 21, to investigate the complaint and file a responsive pleading.
4. Counsel for plaintiff has consented to this extension.
5. No party will be prejudiced by defendant having an additional 15 days, up to and including September 21, to file a responsive pleading.

WHEREFORE Defendant Chris Koster requests that this Court grant Defendant an additional 15 days, up to and including September 21, to file a responsive pleading.

Respectfully submitted,

**CHRIS KOSTER**

Attorney General

By: /s/ Andrew M. Hartnett

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ATTORNEYS FOR DEFENDANT CHRIS KOSTER

**CERTIFICATE OF SERVICE**

I hereby certify that on the 5th day of September, 2012, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system, and also mailed by United States mail, postage prepaid, to:

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/s/ Andrew M. Hartnett